


JULIA C. DUDLEY, CLERK  
BY:   
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with commercial meat product at the Monogram Food Solutions, LLC (“Monogram”) manufacturing plant at 200 Knauss Drive Martinsville, VA in violation of Title 18, United States Code, Section 1365.

3. The manner and means utilized to accomplish the objects of the conspiracy included, among others, urinating onto commercial ready-to-eat meat product inside the Monogram manufacturing plant while video recording such act, as well as contaminating the environment of the Monogram manufacturing plant by urinating on a door and doorjamb while video recording such act.

4. In furtherance of the conspiracy and to achieve the objects therefor, the following overt acts, among others, were committed within the Western District of Virginia and elsewhere: On or about February 21, 2019, MAURICE V. HOWARD did urinate onto commercial ready-to-eat meat product and DEVIN JAMAR STOCKTON did participate in recording, using an iPhone, HOWARD urinating on a door and doorjamb inside the Monogram manufacturing plant.

5. All in violation of Title 18, United States Code, Section 1365(e).

## **COUNT TWO**

The Grand Jury further charges that:

6. Paragraphs 2-4 of the Indictment are re-alleged and incorporated herein by reference.

7. On or about February 21, 2019, in the Western District of Virginia, the defendants, MAURICE V. HOWARD and DEVIN JAMAR STOCKTON, with reckless disregard for the risk that another person would be placed in danger of death or bodily injury and

under circumstances manifesting extreme indifference to such risk, did tamper with a consumer product, that is a commercial meat product, which product affects interstate commerce, by means of urination.

8. All in violation of Title 18, United States Code, Section 1365(a).


**COUNT THREE**

The Grand Jury further charges that:

9. Between on or about March 1, and on or about March 6, 2019, in the Western District of Virginia, the defendant, MAURICE V. HOWARD with intent to extort from a person, firm, association and corporation, money and other things of value, did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the property and reputation of Monogram and Packers Sanitation Services Inc. and certain persons associated therewith.

10. All in violation of Title 18, United States Code, Section 875(d).

A TRUE BILL, this 08 day of August, 2019.

  
THOMAS T. CULLEN  
UNITED STATES ATTORNEY

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON